

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

FILED

Microsoft Corporation,

Plaintiff,

v.

Does 1-10 Operating an Azure Abuse Network,

Defendants.

2024 DEC 19 P 3:03

Case No. _____

FILED UNDER SEAL

**PLAINTIFF'S MOTION FOR A
PROTECTIVE ORDER SEALING DOCUMENTS**

Pursuant to Local Civil Rule 5, Plaintiff Microsoft Corporation ("Microsoft"), hereby moves for an order sealing the instant case in general, and the following documents in particular, filed by Plaintiff in this action:

1. Motion for Protective Order Sealing Documents and attachments hereto, including the Non-Confidential Brief in support of this Motion;
2. Plaintiff's Complaint and the attachments thereto;
3. Pro Hac Vice Applications of Jacob Heath, Robert Uriarte, Ana Mendez-Villamil, and Lauren Baron;
4. Motion to Exceed Page Limits and attachments thereto;
5. Application for an Emergency *Ex Parte* Temporary Restraining Order and Related Relief and accompanying documents;
6. the Declaration of Maurice Mason in Support of Microsoft's Motion for Temporary Restraining Order and Related Relief and Exhibits thereto;
7. the Declaration of Jason Lyons in Support of Microsoft's Motion for Temporary Restraining Order and Related Relief and Exhibits thereto;

8. the Declaration of Rodelio Fiñones in Support of Microsoft's Motion for Temporary Restraining Order and Related Relief and Exhibits thereto;

9. [Proposed] *Ex Parte* Temporary Restraining Order;

10. Emergency *Ex Parte* Motion and Memorandum in Support of Motion for Expedited Discovery;

11. [Proposed] Order relating to Emergency *Ex Parte* Motion and Memorandum in Support of Motion for Expedited Discovery and attachments thereto;

12. Emergency *Ex Parte* Motion and Memorandum in Support of Motion to Permit Alternative Means of Service of Process and attachments thereto; and

13. [Proposed] Order relating to Emergency *Ex Parte* Motion and Memorandum in Support of Motion to Permit Alternative Means of Service of Process.

Plaintiff respectfully requests that the case and these materials be sealed pending execution of the *ex parte* temporary relief sought in Plaintiff's Application for Temporary Restraining Order. As explained in the declaration of Jason Lyons, temporarily sealing this matter to ensure that Defendants do not receive prior notice of this action or Microsoft's requested injunctive relief is important to ensuring the efficacy of any orders issued by the Court.

Plaintiff respectfully requests that immediately upon the execution of the temporary restraining order the instant case be unsealed and the foregoing documents be filed in the public docket. Upon execution of the *ex parte* relief, Plaintiff will file with the Clerk of the Court a Notice that the temporary restraining order has been executed. Plaintiff further requests that upon execution of the temporary restraining order, Plaintiff be permitted to disclose such materials as it deems necessary, including to commence its efforts to effectuate service of the Complaint.

Plaintiff respectfully requests that should the Court decide not to grant the *ex parte*

temporary relief requested in Plaintiff's Application for Temporary Restraining Order that the materials be sealed indefinitely.

Dated: December 19, 2024

Respectfully submitted,



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